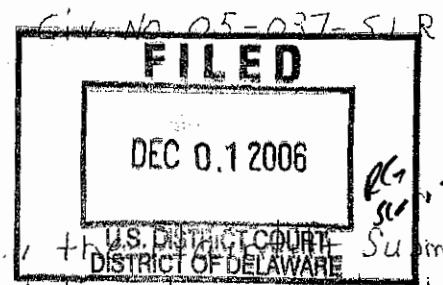


To: Ophelia M. Waters, Dana Spring Monzo and Kevin J. Connors
Deputy Attorney General

From: Harry Samuel, Pro Se
SBI #201360 Pitioner/Plaintiff
Delaware Correctional Center

05cv037 SLR



Discovery

Pursuant to Rules 33 and 34, Fed. R. Civ. P., the following interrogatories and request for documents to the defendants. You are directed to answer each of the interrogatories in writing under oath, and produce each of the requested documents for inspection and copying, within 30 days of service. In addition Request for ADMISSIONS Pursuant to Rule 36, Fed. R. Civ. P., Plaintiff requests defendants to make the following admissions within 30 days after the service of this request.

1. Any and all Policies, directives, Custom, Procedure or instructions to staff concerning the use of handcuffs restraints, behind Plaintiff's back during Dental ~~and~~ Treatment in the Delaware Correctional Center MHU, Maximum Security unit 21, from September 5, 2004 to September 7th, 2006. If the Policies, directives, Custom, Procedure is different for MHU Maximum Segregation inmates than for general Population inmates, state both Policies, directives Custom, Procedure or instructions. If those Policies, directives, Custom, Procedure or instructions are set forth in any Policy, directive, Custom, Procedure or instructions or other document, produce the document.
2. Any and all Policies, directives, Custom, Procedure or instructions to staff, First Correctional Medical and Correctional Medical Service, Inc., concerning filling Inmates/Plaintiff, tooth/teeth at the Delaware Correctional Center MHU Maximum Security unit 21 during September 5, 2004 to September 7, 2006. If the Policies, directives, Custom, Procedure is different for MHU Maximum Segregation inmates than for general

Exhibit-1 (see DI. 84)

TO. Ophelia M. Waters
Deputy Attorney General

From. Harry Samuel, Pro Se
Plaintiff

U. S. District
C.A. NO. 05-037-SLR

Plaintiff letter regarding Plaintiff Discovery Request

Plaintiff Points out to your office that Federal Courts generally require that Parties attempt to resolve discovery disputes themselves before filing motions to compel.

On August 23, 2006. Plaintiff mailed your office a Discovery request by Plaintiff. As a informal resolution.

Plaintiff requested that your office respond to Plaintiff Discovery request within 30 days of service of Plaintiff Discovery request.

It is now 30 days and one week and Plaintiff did not receive your office response to Plaintiff Discovery request within 30 day of the Date Plaintiff Discovery was Mail to your office.

Plaintiff request that your office produce Plaintiff Discovery request. As a informal resolution.

I await your response.

Date 10-1-2006

Respectfully Submitted
Very Truly yours
Harry L. Samuel, Pro se

Exhibit - 2

To. OPhelia Michelle Waters

From. Harry L. Samuel
Plaintiff

U.S. District Court
District of Delaware
Civ. No. 05-037-SLR

Additional Discovery Request

Pursuant to Rule 33 and 34, Fed. R. Civ. P., the Plaintiff submits the following interrogatories and request for documents to the defendants. You are directed to answer each of the interrogatories in writing under oath, and produce each of the requested documents for inspection and copying within 30 days of service.

14. Any and all of the Delaware Correctional Center regulations and Policies on handcuffs Mechanical restraints insofar as Mechanical restraints handcuffs shall never be used in a way that causes undue physical discomfort, inflicts physical pain or in any way restricts the blood circulation or breathing of an inmate. (insofar as the handcuffs pertain to Plaintiff being forced to wear handcuffs in the rear while in the dental chair) Plaintiff force to be handcuff during Dental Treatment by Correctional officer Rob Young on 10-7-04.

State the name, Title and Duty of the Person responsible for the regulations and Policies on Mechanical restraints in the Delaware Correctional Center MHU on 10-7-04 (insofar as the restraints pertain to handcuffs shall never be used in a way that causes undue physical discomfort, inflicts physical pain or in any way restricts the blood circulation).

State the name, Title and Duty of Rob Young Supervisor on 10-7-04, on the 8 to 4 shift that is responsible for Rob Young actions, insofar as they pertain to over seeing Rob Young use of Mechanical restraints handcuffs on Plaintiff in the rear during Dental Treatment. pertaining to restraint regulation that ensure handcuff are not to be use in a manor to cause undue discomfort or inflict pain.

The Discovery Sought is relevant to the Claims and Defenses in the case.

Date 10-24-2006

Harry L. Samuel, Pro Se

Exhibit - 3

Certificate of Service

I, Harry Samuel, hereby certify that I have served a true and correct cop(ies) of the attached: Motion to Compel Discovery with Exhibits 1, 2, and 3 upon the following parties/person (s): oposing

TO: Ophelia M. Waters
State of Delaware
Department of Justice
state office Building
820 N. French St.
Wilmington, Delaware
19801

TO: _____

TO: _____

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 28th day of November, 2006

Harry L. Samuel, Pro se